

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JENNIFER BRADLEY,

Plaintiff,

v.

AMERICAN UNIVERSITY, ET AL.,

Defendants.

Civil Action No. 1:16-cv-00346-RBW

**PLAINTIFF'S RESPONSE TO DEFENDANT HIGGINS, M.D.'S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW Plaintiff, by and through undersigned counsel, and respectfully submits to this Honorable Court her Response to Defendant Higgins, M.D.'s Motion for Summary Judgment. In response thereto, Plaintiff states the following and relies upon the accompanying Memorandum of Points and Authorities:

1. Defendant Higgins was contractually liable for the care and treatment of Dr. Williams.
2. Defendant Higgins's was under a duty to oversee the treatment rendered by Dr. Williams.
3. Defendant Higgins was/is vicariously liable for the negligent treatment of Dr. Williams.
4. In light of dispute of material facts relevant to this issue, summary judgment should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January, 2019, a true copy of the foregoing ECF File

System was provided via the Court's ECF system to:

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